

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

CAMOCO, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 3:20-cv-129
PEOPLE SOURCE STAFFING	)	
PROFESSIONALS, LLC,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

In accordance with 28 U.S.C. §§ 1332, 1441, 1446, Defendant, People Source Staffing Professionals, LLC (“People Source”), files this Notice of Removal. People Source removes this action from the 205th Judicial District Court of El Paso County, Texas, to the United States District Court for the Western District of Texas, El Paso Division (the “Court”). The Court has jurisdiction over this action based on diversity jurisdiction, 28 U.S.C. § 1332, as shown by the following:

1. On or about March 10, 2020, Plaintiff, Camoco, LLC (“Plaintiff”), filed its Original Petition (“Petition”) to initiate Cause No. 2020DCV0922, in the 205th Judicial District Court of El Paso County, Texas, (the “State Court Action”), naming People Source as a defendant.

2. Plaintiff states in its Petition that it is seeking damages in excess of \$1,000,000.00. *See* Ex. 2, Pl.’s Pet. at ¶ I. Plaintiff also seeks declaratory relief and attorney’s fees. *Id.* at ¶¶ VIII.1 and XI.4. As a result, the relief Plaintiff seeks exceeds the amount in controversy requirement for removal based on diversity.

3. At the time of commencement of the State Court Action and at the time of removal, Plaintiff is a limited liability company organized and existing under the laws of Florida and all of its members are Florida citizens. *See* Ex. 5, 8:18-CV-1693 at ¶ I.

4. At the time of commencement of the State Court Action and at the time of removal, Defendant is a limited liability company organized and existing under the laws of Oklahoma and all of its members are Oklahoma citizens. *See* Ex. 2, Pl.'s Pet. at ¶ II.

5. Accordingly, this Court has jurisdiction over the State Court Action, and the State Court Action is removable because (1) Plaintiff has alleged an amount in controversy that exceeds \$75,000 and (2) complete diversity exists. 28 U.S.C. § 1332(a).

6. People Source was served with a copy of the Citation and Petition on April 17, 2020. *See* Ex. 4, Service of Process Transmittal. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely filed within 30 days of receipt of the Petition.

7. Concurrent with the filing of this notice, People Source is serving this notice upon Plaintiff's counsel and filing a copy of the notice with the Clerk of Court of the District Court of El Paso County, Texas.

8. Pursuant to LR CV-3(a), People Source's Civil Cover Sheet is filed contemporaneously herewith.

9. A copy of all process, pleadings, and other documents filed in the State Court Action are attached hereto as follows:

**Exhibit 1 - Docket sheet from the State Court Action**

**Exhibit 2 - Petition, filed March 10, 2020**

**Exhibit 3 - Citation, issued April 13, 2020**

**Exhibit 4 - Service of Process Transmittal**

10. People Source states that this removal is well grounded in fact, warranted by existing law, and not interposed for any improper purpose.

People Source will promptly provide the Plaintiff written notice of the filing of this Notice of Removal, pursuant to 28 U.S.C. § 1446(d). People Source will also file a copy of the Notice of Removal in the State Court Action.

Respectfully submitted,

*s/ Christopher M. Staine*

Christopher M. Staine

State Bar No. 24104576

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**ATTORNEY FOR DEFENDANT  
PEOPLE SOURCE STAFFING  
PROFESSIONALS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2020 (the same date this Notice of Removal was filed in the United States District Court for the Western District of Texas), a true a correct copy of the foregoing Notice of Removal was sent to all counsel of record in the State Court Action, and further that a copy of said Notice of Removal was electronically delivered to the District Court Clerk of El Paso County, Texas for filing that same date.

*s/ Christopher M. Staine*

Christopher M. Staine